

UNITED STATES DISTRICT COURT
for the
Western District of Texas

FILED

September 17, 2024
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY: Fidel Morales
DEPUTY

United States of America
v.
Indira CHAQUECO-Mancilla
Defendant(s)

Case No.

EP:24-M-03957-MAT

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 16, 2024 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 1546(a)

Did possess a document prescribed by statute and regulation for entry into or as evidence of authorized stay and employment in the United States, namely: a counterfeit Texas birth certificate, knowing it to have been counterfeited.

This criminal complaint is based on these facts:

Continued on the attached sheet.

Complaint sworn to telephonically on
September 17, 2024 at 02:00 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**

Sworn to before me and signed in my presence.

Date: 09/17/2024

City and state: El Paso, Texas



Complainant's signature

Jose L. Ramos,
CBP Enforcement Officer

Miguel A. Tam

Judge's signature
Miguel A. Torres.
U. S. Magistrate Judge

That on or about September 16, 2024, the DEFENDANT, Lorna Indira CHAQUECO-Mancilla, a native and citizen of Mexico, applied for admission into the United States from Mexico via pedestrian lanes at the Area Port of Ysleta located in El Paso, Texas located in the Western District of Texas, by presenting a counterfeit State of Texas birth certificate bearing her name along with a copy of a State of Texas Temporary Identification Card bearing her name and photograph to Customs and Border Protection (CBP) Primary Officer. CBP Primary Officer asked the DEFENDANT what her name and date of birth was, the DEFENDANT provided her name and the date of birth that was listed on the documents that she was presenting. CBP Primary Officer asked the DEFENDANT what her citizenship was, the DEFENDANT stated that she was a United States citizen. CBP Primary Officer asked the DEFENDANT where she was born, the DEFENDANT stated that she was born in El Paso, Texas. During primary interview the DEFENDANT stated that she was visiting her father in Mexico for a couple of days and that she was returning home. CBP primary Officer asked the DEFENDANT when the last time was that she had crossed through a port of entry, the DEFENDANT stated that approximately two weeks ago. Primary Officer queried the name and date of birth that the DEFENDANT provided and noticed there was no crossing history with the name and date of birth provided. CBP Primary Officer asked the DEFENDANT if the documents that she was presenting where hers, the DEFENDANT stated yes. CBP Primary Officer referred the DEFENDANT into Passport Control Secondary (PCS) for further inspection and citizenship verification.

In PCS, During Secondary interview the DEFENDANT stated to CBP Secondary Officer her name and the date of birth that was listed in the documents that she was presenting to make entry, the DEFENDANT stated that she was born in El Paso, TX at Thomason Hospital. Secondary Officer asked the DEFENDANT where she obtained her Texas permit, the DEFENDANT stated at the Department of Public Safety, CBP Secondary Officer asked the DEFENDANT which Department of Public Safety, the DEFENDANT stated that she could not remember. The DEFENDANT's fingerprints were digitally scanned, and database records revealed the DEFENDANT's name with her correct date of birth and being a citizen and national of Mexico. The DEFENDANT was served form I-214 Warning as to Rights which she read, signed and invoked her right to have an attorney present during questioning. All questioning ceased.

Other queries revealed that the DEFENDANT applied for a tourist visa on September of 2023 which was refused by Department of State.

Because this Affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

CRIMINAL AND IMMIGRATION RECORD

CRIMINAL RECORD

None can be established at this time.

IMMIGRATION RECORD

None can be established at this time.